

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**BMG RIGHTS MANAGEMENT
(US) LLC, and ROUND HILL
MUSIC LP**

Plaintiffs,

V.

Case No. 1:14-cv-1611(LOG/JFA)

**COX ENTERPRISES, INC.,
COX COMMUNICATIONS, INC.,
COXCOM, LLC**

Defendants.

BMG RIGHTS MANAGEMENT (US) LLC AND ROUND HILL MUSIC LP'S
MOTION TO COMPEL

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37, Plaintiffs BMG Rights Management (US) LLC and Round Hill Music LP respectfully move this Court to compel Defendants Cox Communications, Inc. (“Cox Communications”) and Defendant CoxCom, LLC (“CoxCom”) (collectively “Cox”) to designate one or more corporate representatives to testify, under Federal Rule of Civil Procedure 30(b)(6), to topics 41 - 47 identified in the Second Amended Notice of Corporate Deposition to Cox Communications and the first Notice of Corporate Deposition to CoxCom. In the alternative, Plaintiffs seek leave to notice Cox for additional topics for corporate testimony. For the reasons set forth in the accompanying Memorandum in Support, the Court should grant the Motion.

Local Rule 37(E) Meet and Confer Statement

Counsel for BMG/RH held a telephonic meet and confer with Defendants' counsel on July 9, 2015 concerning Defendants' discovery responses. Both parties subsequently exchanged letters clarifying their discussions. Despite their efforts, the parties were unable to resolve all of their disputes.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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